

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Plaintiff, )  
vs. )  
Defendants. )  
                )  
                )

Judge J. Nicholas Ranjan

**Fed. R. Civ. P. 26(f) REPORT OF THE PARTIES**

**1. Subjects of Fact Discovery:**

**2. Subjects of Expert Discovery:**

**3. Can fact and expert discovery occur at the same time? Why/why not?**

**4. Pre-trial Deadlines:**

- a. Date for Initial Disclosures:

- b.** Date for joinder/amendment:
- c.** Date for close of fact discovery:
- d.** Date for close of expert discovery, if bifurcated:

**5. Do the parties want a Rule 502 non-waiver order – Yes or No?**

**6. Are there any ESI issues to address? If yes, please explain:**

**7. Protective Order – Yes or No? If yes, please explain:**

Respectfully submitted,

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